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**OFFICE OF ENVIRONMENTAL RESTORATION
SOUTHWESTERN AREA PROGRAMS**PAGES: 6
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Here are our comments resulting from review of the final OU-15 TM-1, which incorporated the formal comments.

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**REVIEW OF COMMENT INCORPORATION: FINAL PHASE I RFI/RI TECHNICAL
MEMORANDUM NUMBER 1, ROCKY FLATS PLANT, INSIDE BUILDING CLOSURE
(OPERABLE UNIT 15)**

The comments made by the Department of Energy on the Draft Phase I RFI/RI Technical Memorandum Number 1, Operable Unit (OU) 15 have been checked against the responses made by the Rocky Flats Plant and the final version of the Technical Memorandum (TM). The status of incorporation of each comment is presented with bold face type following each comment in the attached copy of the comment set. In summary, the status falls into four categories:

1. The comment is incorporated in the revision process. Ten out of 14 comments (71%) fall into this category.
2. The comments are no longer applicable because the material discussed in the comments has been removed from the final version of the TM. Three comments fall into this category. The comments raised the questions concerning the screening levels used that are below detection limit. The text is removed because the Colorado Department of Health (CDH) considers that it is inappropriate to use the risk-based screening levels as clean closure performance standards for the Individual Hazardous Substance Sites (IHSSs) in OU 15 and requests that CDH requirements for clean closure at OU 15 specified in the Rocky Flats Plant Hazardous Waste Permit be used.
3. The Critical Comment did not appear in the DOE comments. The specific comment supporting the critical comment has been addressed in the final version of the TM.
4. One comment is rejected because the author believes that it is inappropriate to include the information suggested by the comment (scale of drawings) in unclassified documents.

**DOCUMENT REVIEW: DRAFT PHASE I RFI/RI TECHNICAL MEMORANDUM
NUMBER 1, ROCKY FLATS PLANT, INSIDE BUILDING CLOSURES
(OPERABLE UNIT 15)**

CRITICAL COMMENTS

Section 7 indicates that upon receipt of comments this document will be modified and the title changed to "Draft Phase I RFI/RI." The document is not presently formatted consistent with the requirements specified in the Interagency Agreement. Specifically the document does not contain a Preliminary Site Characterization, Baseline Risk Assessment, or Environmental Evaluation. If Rocky Flats Plant (RFP) has been advised by the regulators that this information is unnecessary for this report, then the document introduction should include the appropriate references.

The comment was deleted and did not appear in the comments sent out by the Department of Energy. However, Specific Comment 12 that supports the Critical Comment remains in the DOE comment set.

GENERAL COMMENTS

1. The source of beryllium contamination and how this contamination is to be addressed should be further explained. Although the beryllium is detected at several Individual Hazardous Substance Sites (IHSSs), the document concludes that the beryllium contamination detected at the IHSSs (see Specific Comment 11) will not affect pursuing clean closure and should be addressed as a general building concern. Please elaborate on how the beryllium contamination will be addressed and how the data collected during this action will be incorporated in further investigations. Clean closure of the IHSSs may be inappropriate before the beryllium contamination issue is resolved.

Incorporated. Additional text is provided in Sect. 4.8.2 to address the beryllium issue. The text indicates that the RCRA clean closure performance standards specified in the RFP State RCRA Permit do not include beryllium.

2. The report presents two instances, Specific Comments 7 and 10, where detection levels were higher than the screening levels. The report should discuss whether this was the result of the screening level being reduced after the surveys or if proposed detection limits were not achieved during this investigation.

Text deleted. Risk-based closure performance standards have been eliminated from TM 1.

3. The engineering drawings in Figs. 2-2 to 2-20 are presented without a scale. Please provide the scale for each drawing.

Not incorporated because of security concerns.

DRAFT

SPECIFIC COMMENTS

1. Section 1.4, p. 1-5, last paragraph, first sentence: The sentence states that Sect. 2.0 of this document summarizes the Field Sampling Plan (FSP). However, the section summarizes only the quantity and location of the samples collected during the Phase I RFI/RI process and the rationale for the sampling is essentially explained in Sect. 3. The text would be much clearer if Section 2 is merged into Sect. 3.

Incorporated. Text has been reorganized.

2. Section 2.4, p. 2-8, second paragraph: Please provide a summary table showing the results of the quality control sampling. The listing in Sect. 3 does not provide a specific break-out providing these sample results.

Incorporated. The list and discussion are provided.

3. Section 2.5, p. 2-10, first paragraph: Please clarify the system limitations that did not allow for input of sample locations. If the system was unable to track sample locations, then please explain how this information will not be "lost" over time.

Incorporated. Text is modified.

4. Section 3.0, p. 3-1, second paragraph: If possible the data presented in the tables should be identified as validated or unvalidated. If this report is going to be used for making the decision not to conduct planned field work, then representation of unvalidated data is necessary to adequately evaluate the decision for No Further Action (NFA) at these IHSSs.

Incorporated. Validation status included in the data tables.

5. Section 4.0, p. 4-1, first paragraph: Please clarify the purpose of the screening process used. It appears that the screen is to both include and exclude contaminants of concern, but the process is not well described.

Text deleted and the comment is no longer applicable.

6. Section 4.0, p. 4-1, second paragraph: Please clarify the last sentence in this paragraph. Specifically identify what constitutes "chemical quality assurance reasons."

Text deleted.

7. Section 4.0, p. 4-2, last paragraph: The text indicates that the fixed alpha- and beta-radiation survey will not be evaluated further because of the high detection limit and the variability of the

DRAFT

Page 3 of 4

Draft Phase I RFI/RI TM 1 OUI5

results. This decision raises the question concerning the original goals and data quality objectives of the fixed alpha- and beta-radiation survey. Please clarify.

Incorporated. Text is modified.

8. Section 5.1, p. 5-6, last paragraph: The text indicates that a more conservative dust loading value (Hawley, 1985) is used instead of the Nuclear Regulatory Commission (NRC) approach. Please explain why a more conservative dust load value is used (i.e., does the NRC approach cause unacceptable uncertainty or risk?).

Incorporated. NRC approach is used.

9. Section 6.2, p. 6-3, second paragraph: The chemical constituent bis(2-ethylhexyl)phthalate (DEHP) detected is interpreted to be the result of the use of plastic components in the hot water riser. The interpretation should be tested by sampling the water in contact with plastic component before eliminating DEHP as a chemical of concern.

Incorporated. Equipment blank data are included.

10. Section 6.4.1.1, p. 6-7, third paragraph, second sentence: The sentence states that the method detection limit for beryllium is substantially above the screening level. As shown in Table 5-3, the noncarcinogenic screening level is 9660 mg/kg and carcinogenic screening level is 1.24 mg/kg. Why the method detection limit is substantially above these levels is unclear. Please indicate the method detection limit. In addition, if the method detection limit is substantially higher, then the function of the conservative screening level is unclear. Please clarify.

No longer applicable because of the elimination of risk-based screening approach.

11. Section 6.4.1.1, p. 6-7, third paragraph: The text states that the beryllium may be associated with other operations in Building 865 and is not associated specifically to IHSS 179; therefore, "further action on beryllium contamination should not be required to clean close IHSS 179." The same conclusions are also drawn for other IHSSs discussed in this technical memorandum. Regardless of the source of the contamination, it is not clear how clean closure could be reached if the IHSSs have been contaminated. Please clarify.

Incorporated. Addressed in Section 6.3.2.

12. Section 7.0, p. 7-1: It is proposed that "upon resolution and incorporation of all comments on Technical Memorandum Number 1, the revised document will be submitted as the Draft Phase I RFI/RI Report for OU 15." Section 3.0 indicates that the results presented in the section contain unvalidated data and the data will be incorporated into the Phase I RFI/RI Report after the data validation process. In addition, the Interagency Agreement (IAG) requires that the

DRAFT

Page 4 of 4

Draft Phase I RFI/RI TM 1 OUI5

Draft Phase I RFI/RI Report must contain a Baseline Risk Assessment (BRA). Please indicate how the incorporation of the newly validated data will fit into the schedule, which indicates that a report will be ready by April 8, 1994, and whether a complete BRA will be performed after the completion of data validation.

Incorporated. Revised schedule is provided.

Additional Comments on OU-15 TM-1 Inside Building Closures

SPECIFIC COMMENT

Table 6-1, p. 6-25: The footnoted information and corresponding text recommendations indicate that additional activity is going to take place at IHSSs 211 and 217. Therefore the use of No Further Action (NFA) for these IHSSs is misleading. The recommendations presented for action should be detailed and a schedule presented for accomplishing those actions attached. Specifically, provide how the soil surrounding the 881 footing drain will be studied and the schedule for fume hood and laboratory table removal.

Incorporated. Text is modified.

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